

# **EXHIBIT 14**

**Index of Other Employee Declarations**

<b>Employee</b>		<b>Title</b>	<b>Department</b>	<b>Campus</b>
Ayrapetyan	Firuz	Pharm Tech	Pharmacy	Main
	Benjamin			
Beverly	E.	Distribution Clerk	SCM Linen	Main
Burak	Cindy	Pharm Tech	Pharmacy	Main
			Plant	
Calder	William	Electrician A	Operations	Main
		Patient	Patient	
Charles	Travis	Transporter	Transport	Main
			Architectural	
Cole	Julius	Painter	Trades	Main
			Plant	
Cucinella	Gaspere	Electrician A	Operations	Main
Domine	Robert	Plumber	Engineering	Main
Gyiraszin	Debbie	CSR	Transplant	Main
			Plant	
Mitchell	Harold	Bldg Engineer	Operations	Main
			Plant	
Nelson	Michael	Leader	Operations	Main
		Food Svc	Culinary	
Perreca	Amy	Assistant	Wellness	Main
		Patient	Patient	
Robinson	Willard	Transporter	Transport	Main
Sobolewski	Alexander	Plumber A	Engineering	Main
			Architectural	
Suwalkowski	Joseph	Leader	Trades	Main
			Architectural	
Ugorcak	Tim	Mason	Trades	Main
			Environmental	
Walker	Katrina	Housekeeper	Services	Main

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
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One Towne Square, 17th Floor  
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**DECLARATION OF** *Firuz Ayrapetyan*

1. My name is *Firuz Ayrapetyan*.

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a pharmacy technician in the Pharmacy Department at Henry Ford Hospital. I have been employed with HFHS since 2005.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

yes I wash and dry my scrubs/other uniform at home with my other clothes.

yes I remove my scrubs/other uniform from the drying machine before they become wrinkled.

yes My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

no I use a laundry or dry cleaning service for my scrubs/other uniform.

no I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 08/04/15

F. Ayrapetyan  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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bebuchanan@varnumlaw.com

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DECLARATION OF Benjamin E. Beverly [INSERT NAME]

1. My name is Benjamin E. Beverly [INSERT NAME].
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.
3. I am currently employed with Henry Ford Health System ("HFHS") as a Dis. Clerk [INSERT JOB TITLE] in the

Linen Room [NAME OF DEPARTMENT/BUSINESS UNIT] at HFHS [FACILITY NAME]. I have been employed with HFHS since 2013 [INSERT DATE OR YEAR].

4. My work uniform is scrubs or Polo shirt & Slacks. [IF NOT SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT APPLY]

NA. I use a laundry or dry cleaning service for my scrubs/other uniform.

NA I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8-6-2015

Bernadette Beverly  
Name: [PRINT NAME]

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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**DECLARATION OF CINDY BURAK**

1. My name is CINDY BURAK.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a PHARMACY TECHNICIAN in the CENTRAL PHARMACY at HENRY FORD. I have been employed with HFHS since 1982  
MAIN CAMPUS

4. My work uniform is scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so. CORRECT

6. HFHS never told me that I had to iron my scrubs/other uniform. CORRECT

7. In addition:

YES I wash and dry my scrubs/other uniform at home with my other clothes.

YES I remove my scrubs/other uniform from the drying machine before they become wrinkled.


NO My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

NO I use a laundry or dry cleaning service for my scrubs/other uniform.

NO I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/4/2015

Name: 



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Neil B. Pioch (P67677)  
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bebuchanan@varnumlaw.com

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**DECLARATION OF [William Calder]**

1. My name is [William Calder].
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Electrician A in the Plant Operations at HFHS-Main Campus. I have been employed with HFHS 2011.

4. My work uniform is scrubs or Plant Ops Shirt/Blk Pants.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.


☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8-4-15

  
Name: William Calder

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF** Travis Charles

1. My name is Travis Charles.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Patient Transporter in the Patient Transportation Department at Henryford Main Campus. I have been employed with HFHS since July/2015.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: August 4, 2015

Travis Charles  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
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bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Julius Cole.

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Painter in the Architectural Trades  
at Henry Ford Hospital <sup>MASA CAMPUS</sup>. I have been employed with HFHS since  
1973  
4 yrs.

4. My work uniform is scrubs or Painter uniform.

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

yes I wash and dry my scrubs/other uniform at home with my other  
clothes.

yes I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

yes My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform.

no I use a laundry or dry cleaning service for my scrubs/other  
uniform.

no I receive my scrubs from the Scrubex service provided by  
HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:**

Date: 8/4/15

Julius Cole  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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Neil B. Pioch (P67677)  
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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF [Gaspare Cucinella]**

1. My name is [Gaspare Cucinella].
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.



3. I am currently employed with Henry Ford Health System ("HFHS") as a Electrician A in the Plant Operations at HFHS-Main Campus. I have been employed with HFHS 2006.

4. My work uniform is scrubs or Plant Ops Shirt/Blk Pants.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ <sup>MMC</sup> My spouse/roommate/significant other/child/parent <sup>MMC</sup> washes my scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/4/15

Gaspere M. Cucinella  
Name: Gaspere Cucinella



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is ROBERT DOMINE.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a PLUMBER in the ENGINEERING DEPT at MAIN CAMPUS. I have been employed with HFHS since 1976.

4. My work uniform is scrubs or SHIRT & PANTS.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/4/15

Robert Carl Demine  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,  
v

Case No. 2:15-cv-12101  
Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

---

**DECLARATION OF**

1. My name is Debbie Gynasza

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a CSR in the Transplant Dept.  
at HFHS MAIN. I have been employed with HFHS since  
2009

4. My work uniform is scrubs or uniform / VEST shirts / pants

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:**

Date: 8-5-15

[Signature]  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,  
v

Case No. 2:15-cv-12101  
Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
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(248) 567-7400  
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bebuchanan@varnumlaw.com

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**DECLARATION OF [Harold Mitchell]**

1. My name is [Harold Mitchell].
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Building Engineer in the Plant Operations at HFHS-Main Campus. I have been employed with HFHS 2004.

4. My work uniform is scrubs or Plant Ops Shirt/Blk Pants.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8.4.15

  
Name: Harold Mitchell

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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Neil B. Pioch (P67677)  
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bebuchanan@varnumlaw.com

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**DECLARATION OF [Michael Nelson]**

1. My name is [Michael Nelson].
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a \_Ldr- Plant Operations in the Plant Operations at HFHS-Main Campus. I have been employed with HFHS 1979.

4. My work uniform is scrubs or Plant Ops Shirt/Blk Pants.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8-4-15

Michael Nelson  
Name: Michael Nelson



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

HENRY FORD HEALTH SYSTEM,

Defendant.

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Hon. David Lawson

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bebuchanan@varnumlaw.com

DECLARATION OF

[INSERT NAME]

1. My name is Amy Perreca [INSERT NAME].

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Food Service Assistant [INSERT JOB TITLE] in the

Culinary Wellness [NAME OF DEPARTMENT/BUSINESS  
UNIT] at Henry Ford Hospital [FACILITY NAME]. I have been  
employed with HFHS since 1994 [INSERT DATE OR YEAR].

4. My work uniform is scrubs or black pants, rust-colored shirt. [IF NOT  
SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT  
APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: 8-4-2015

Amy Perreca  
Name: [PRINT NAME]

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
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bebuchanan@varnumlaw.com

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**DECLARATION OF Willard Robinson**

1. My name is Willard Robinson.
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Patient Transporter in the Patient Transportation Department at Henry Ford Hospital Main Campus. I have been employed with HFHS since 1995.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: August 4, 2015

William J. Roberts  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Alexander Sobolewski.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Plumber A in the Main Campus at Detroit. I have been employed with HFHS since 1975.

4. My work uniform is scrubs or Shirt and Pants.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☐ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8-4-2015

Ally Schuler  
Name:



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is JOSEPA SUWATKOWSKI

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a LEADER in the ARCHITECTURAL TRADES  
at HFH DOWNTOWN. I have been employed with HFHS since  
1992.

4. My work uniform is scrubs or WHITE SHIRT & BLACK PANTS

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:**

Date: 8-5-15

  
Name:



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Tim Dyoeck.

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a MSN in the Mat Trn at St. Joseph. I have been employed with HFHS since 2000.

4. My work uniform is scrubs or Blue short Blue pants.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

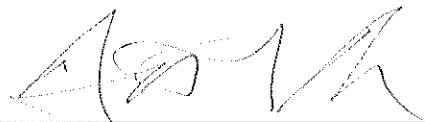
☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8-4-15

  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
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---

**DECLARATION OF**

1. My name is Katrina Walker.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Housekeeper in the EVS  
at Henry Ford Hospital. I have been employed with HFHS since  
8-6-2001

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

\_\_\_\_ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

\_\_\_\_ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform.

☒ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

\_\_\_\_ I receive my scrubs from the Scrubex service provided by  
HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:**

Date: 8-6-15

Kathleen Walker  
Name: